

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
CLEVELAND DIVISION**

JASMINE LAWRENCE, individually and)
on behalf of all similarly situated)
individuals,)
)
Plaintiff,)
)
vs.)
)
MAXIM HEALTHCARE SERVICES,)
INC., a Maryland Corporation,)
)
Defendant.)

CASE NO.: 1:12-cv-2600

HONORABLE CHRISTOPHER A. BOYKO

MOTION FOR ADMISSION *PRO HAC*
VICE OF ATTORNEY CARLOS V.
LEACH AND MORGAN & MORGAN,
P.A.

Plaintiff, JASMINE LAWRENCE, individually and on behalf of all similarly situated individuals, and the putative class, respectfully move this Court to admit Carlos V. Leach, Esq., and the law firm of Morgan & Morgan, P.A., *pro hac vice*, so that they may serve as co-counsel for Plaintiff in this matter. In accordance with Local Rule 83.5(h), Plaintiff state as follows:

1. Mr. Leach has been, and presently is a member in good standing of the Florida Bar, and more particularly, the United States District Court for the Middle District of Florida. Mr. Leach is also admitted and eligible to practice before the following courts:

Name of State or Federal Bar or Court	Bar Number	Date Admitted	Status	Address
The Florida Bar	0540021	January 28, 2002	Active / Good Standing	651 E. Jefferson Street Tallahassee, FL 32399
U.S. Supreme Court of Florida	0540021	2/13/02	Active / Good Standing	500 S. Duval St. Tallahassee FL 32399
U.S.D.C., Middle District of Florida	0540021	11/3/04	Active / Good Standing	401 West Central Boulevard Suite 1200 Orlando, FL 32801
U.S.D.C., Northern District of Florida	0540021	10/08	Active / Good Standing	111 N. Adams St. Tallahassee, FL 32301
U.S.D.C., Southern District of	0540021	10/18/10	Active /	400 North Miami Avenue

Florida			Good Standing	Miami, FL 33128
U.S.D.C., District of Colorado	0540021	11/25/09	Active / Good Standing	901 19th Street Denver, Colorado 80294
U.S.D.C., Western District of Tennessee	0540021	3/9/12	Active / Good Standing	167 N. Main Street Memphis, Tennessee 38103
U.S. Court of Appeals for the Eleventh Circuit	0540021	11/2/09	Active / Good Standing	56 Forsyth St. N.W. Atlanta, Georgia 30303
U.S. Court of Federal Claims	0540021	2/8/12	Active / Good Standing	717 Madison Place, NW Washington, DC 2005-1011
U.S.D.C., Southern District of Indiana	0540021	1/3/13	Active / Good Standing	46 E. Ohio St., Rm 105 Indianapolis, IN 46204

2. Mr. Leach's address, telephone number, facsimile number, and e-mail address are as follows:

Morgan & Morgan, P.A.
20 North Orange Avenue, Suite 1400
Orlando, FL 32802
Telephone: (407) 420-1414
Facsimile: (407) 245-3341
Email: CLEach@forthepeople.com

3. Mr. Leach's registration number in the State of Florida is 0540021.

4. The affidavit of Mr. Leach in support of this Motion is attached as **Exhibit "A"**.

Therefore, Plaintiff respectfully requests that this Court permit Carlos V. Leach, Esq., of the law firm Morgan & Morgan, P.A., to appear on their behalf in this proceeding.

Respectfully submitted,

/s/ Robert E. DeRose
Robert E. DeRose, Esq. (0055214)
Barkan Meizlish Handelman Goodin DeRose
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically on March 12, 2013 using the CM/ECF filing system which I understand will send a notice of electronic filing to all parties of record through the Court's system.

Respectfully submitted,

/s/ Robert E. DeRose
Robert E. DeRose, II, Esquire